

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
KAREEM SMITH,	:	VIOLATIONS:
a/k/a “Wink,”	:	21 U.S.C. § 846 (conspiracy to
a/k/a “Lucky,”	:	distribute 5 kilograms or more of
a/k/a “Lamar Jones,”	:	cocaine and 50 grams or more of
a/k/a “Ronald Parker,”	:	cocaine base (“crack”) - 1 count)
JAMAL TURNQUEST,	:	18 U.S.C. § 924(c) - 1 count)
a/k/a “Pop,”	:	18 U.S.C. § 922(g)(1) - 1 count)
a/k/a “P,”	:	Notice of forfeiture
DARRYLE DUNBAR,	:	
a/k/a “DJ,”	:	
a/k/a “Mark Cross,”	:	
DAANIYAL MUHAMMAD,	:	
a/k/a “Lil,”	:	
a/k/a “Kalil,”	:	
VERNICE GARVIN,	:	
a/k/a “VG,”	:	
MALIK BLAND,	:	
a/k/a “Easy,”	:	
FREDERICK LECOUNT,	:	
a/k/a “JR,”	:	
a/k/a “Junior,”	:	
a/k/a “Big Man,”	:	
STEVEN BERNARD,	:	
a/k/a “Philly Steve,”	:	
a/k/a “Steve Owens,”	:	
DAVID CARTER	:	
MICHAEL MARTIN	:	
JASON YURTH	:	
KENNETH BALDWIN,	:	
a/k/a “Chico,”	:	
a/k/a “Big Money,”	:	
DAVID SPRATT	:	

INDICTMENT

THE GRAND JURY CHARGES THAT:

1. From in or about a date unknown to the grand jury, beginning at least in November 2002 through on or about March 14, 2007, in Philadelphia, in the Eastern District of Pennsylvania, in the District of Maryland, and elsewhere, defendants

KAREEM SMITH,
a/k/a “Wink,”
a/k/a “Lucky,”
a/k/a “Lamar Jones,”
a/k/a “Ronald Parker,”
JAMAL TURNQUEST,
a/k/a “Pop,”
DARRYL DUNBAR,
a/k/a “DJ,”
a/k/a “Mark Cross,”
DAANIYAL MUHAMMAD,
a/k/a “Lil,”
a/k/a “Kalil,”
VERNICE GARVIN,
a/k/a “VG,”
MALIK BLAND,
a/k/a “Easy,”
FREDERICK LECOUNT,
a/k/a “JR,”
a/k/a “Junior,”
a/k/a “Big Man,”
STEVEN BERNARD,
a/k/a “Philly Steve,”
a/k/a “Steve Owens,”
DAVID CARTER,
MICHAEL MARTIN
JASON YURTH
KENNETH BALDWIN,
a/k/a “Chico,”
a/k/a “Big Money,” and
DAVID SPRATT

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute controlled substances, that is, 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, and 50 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack cocaine”), all in violation of Title 21, United States Code, Section 841(a)(1).

MANNER AND MEANS

It was part of the conspiracy that:

2. **KAREEM SMITH** was the leader and organizer of a cocaine and cocaine base (“crack cocaine”) distribution gang (hereinafter referred to as the **SMITH Crack Cocaine Gang (“SCCG”)**, which distributed in excess of 5 kilograms, that is, more than 100 kilograms of cocaine base (“crack cocaine”), conservatively valued at \$1,900,000, between approximately November 2002 and March 2007.

3. Defendant **KAREEM SMITH** and others known and unknown to the grand jury obtained kilogram quantities of cocaine from suppliers known and unknown to the grand jury, located both outside of and from within the Eastern District of Pennsylvania.

4. Defendant **KAREEM SMITH** and others transported cocaine from Philadelphia in the Eastern District of Pennsylvania, to Cecil County, Maryland, and elsewhere, where it was most often converted, or “cooked,” into crack cocaine and then distributed through various co-conspirators to customers of the **SCCG**, located both inside and outside of the Eastern District of Pennsylvania.

5. Defendant **KAREEM SMITH** controlled the operations of the **SCCG** through the following conspirators:

a. Defendants **JAMAL TURNQUEST** and **DARRYLE DUNBAR** were the principal managers for the **SCCG**;

b. Defendants **DAANIYAL MUHAMMAD, VERNICE GARVIN, MALIK BLAND, FREDERICK LECOUNT, STEVE BERNARD, DAVID CARTER, KENNETH BALDWIN,** and **DAVID SPRATT**, along with persons known to the grand jury, were sellers for the **SCCG**;

c. Defendants **DAVID CARTER** and **DAVID SPRATT**, and persons known and unknown to the grand jury, provided their residences to **KAREEM SMITH** as a place to “cook” and sell crack cocaine for the **SCCG**;

d. Defendants **MICHAEL MARTIN** and **JASON YURTH**, along with others known and unknown to the grand jury, obtained motel rooms in Cecil County, Maryland for the **SCCG** to use for sales of crack cocaine; and

e. Defendant **MICHAEL MARTIN** and others known and unknown to the grand jury, drove defendants **KAREEM SMITH** and **JAMAL TURNQUEST** between Cecil County, Maryland and the Eastern District of Pennsylvania for the purpose of obtaining additional cocaine for sale in Maryland, and for the purpose of delivering crack cocaine, cooked in Cecil County, Maryland, to sellers in the Eastern District of Pennsylvania, including, but not limited to, defendant **KENNETH BALDWIN**.

6. Defendants **KAREEM SMITH, DARRYLE DUNBAR,** and **JAMAL TURNQUEST** obtained firearms for use in protecting the narcotics and the proceeds earned from the sale of narcotics by “renting” firearms from persons unknown to the grand jury and by trading crack cocaine for firearms with persons known and unknown to the grand jury. Many of the firearms traded for crack cocaine were transported to Philadelphia.

7. Defendants **KAREEM SMITH, JAMAL TURNQUEST,** and **DARRYLE DUNBAR** obtained residences for use as sales locations by “paying” the owners or tenants of apartments, trailers and single-family homes in and around Cecil County, Maryland with a steady supply of crack cocaine to feed the owners’/tenants’ own addictions, and then locating a seller for the **SCCG** inside the residence to meet with customers. In some instances, the owners/tenants participated in the sales of crack cocaine.

8. Defendant **KAREEM SMITH** used a particular packaging for crack cocaine supplied to the sellers for the **SCCG**, consisting of both plastic baggies tied off and knotted at the top and straws filled with crack cocaine and sealed at the ends.

9. Defendant **KAREEM SMITH** was supplied with deliveries of cocaine by a person known to the grand jury, who lived in and made deliveries of cocaine to defendant **SMITH** in the Eastern District of Pennsylvania.

10. **SCCG** defendants and conspirators:

a. obtained, possessed, and used identification cards, such as Maryland Driver’s Licenses, containing false information, and also used aliases to conceal their identities, activities, and roles in the **SCCG**;

b. manufactured, stored, and secreted cocaine and crack cocaine, belonging to the **SCCG**, in various locations in the Eastern District of Pennsylvania and elsewhere;

c. generated, collected, stored, and transported large amounts of cash proceeds from the sales of cocaine and crack cocaine;

d. maintained books and records of cocaine and crack cocaine related transactions as part of the business of the **SCCG**; and

e. convinced others to assist in obtaining motel rooms and residences used to sell crack cocaine to retail customers, and convinced others to assist in providing transportation for members of the **SCCG** in order to obtain cocaine and transport it between Maryland and the Eastern District of Pennsylvania.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objects, the defendants, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania, the District of Maryland and elsewhere:

1. On or about November 6, 2002, defendant **JASON YURTH** and Person #1, known to the grand jury (Person #1), rented two rooms at the Motel 6 in Elkton, Maryland, for defendant **DARRYLE DUNBAR** to use to sell crack cocaine.

2. On or about November 8, 2002, defendant **DARRYLE DUNBAR** possessed crack cocaine, packaging materials, a digital scale, approximately \$816 in drug proceeds, and a Colt, Model Police Positive, .38 caliber revolver, serial number 111241, at the Motel 6, 223 Bell Hill Road in Elkton, Maryland.

3. On or about December 13, 2002, defendant **DARRYLE DUNBAR** possessed approximately 64 grams of cocaine, 54 pink packets containing approximately 9.5 grams of crack cocaine, approximately \$354 in drug proceeds, an RG Industries, Model RG25, .25 caliber semi-automatic pistol, serial number P063519, a magazine loaded with seven live rounds of .25 caliber ammunition, a Colt U.S. Military, Model 1911, .45 caliber semi-automatic pistol, a magazine loaded with seven live rounds of .45 caliber ammunition, numerous rounds of .25 and .45 caliber rounds of ammunition in their original boxes, at 103 Champlain Road in North East, Maryland.

4. On or about January 31, 2003, defendant **KAREEM SMITH** supplied Person #2, a person known to the grand jury (Person #2), with 46.7 grams of crack cocaine, which was to be distributed on behalf of defendant **SMITH** at 14 Bertran Court in North East, Maryland.

5. On or about October 10, 2003, defendant **DAANIYAL MUHAMMAD** distributed approximately .3 grams of crack cocaine and possessed approximately 3.6 grams of additional cocaine for distribution, in the vicinity of 293 Hollingworth Manor in Elkton, Maryland.

6. In or about October 2003, defendant **MALIK BLAND** met with defendant **KAREEM SMITH** in Philadelphia, in the Eastern District of Pennsylvania, and agreed with defendant **SMITH** to sell defendant **SMITH's** crack cocaine in the vicinity of Cecil County, Maryland, and to provide the profits to defendant **SMITH**.

7. On or before October 17, 2003, Person #2 traveled to 43 Elwood Road in North East, MD with defendant **KAREEM SMITH** and sold approximately .5 grams of crack cocaine to an undercover officer.

8. On or about October 19, 2003, defendants **MALIK BLAND** and **KAREEM SMITH** traveled from the Eastern District of Pennsylvania to Cecil County, in the District of Maryland, for the purpose of distributing crack cocaine.

9. On or about October 21, 2003, defendant **MALIK BLAND** sold approximately .5 grams of crack cocaine to an undercover police officer from the residence located at 43 Elwood Road in North East, Maryland.

10. On or about October 24, 2003, defendant **MALIK BLAND** sold approximately one gram of crack cocaine, and possessed approximately 76 packets containing

approximately 8.5 grams of crack cocaine for distribution, inside the residence at 43 Elwood Road in North East, Maryland.

11. On or about August 22, 2004, defendant **STEVEN BERNARD** possessed approximately 22.63 grams of crack cocaine for distribution, inside the residence at 1724 54th Street in Philadelphia.

12. On or about February 27, 2006, defendant **MICHAEL MARTIN** rented motel room number 444 at the Knights Inn, 262 Belle Hill Road in Elkton, Maryland, for defendant **JAMAL TURNQUEST** to use to sell crack cocaine.

13. On or about March 7, 2006, defendant **JAMAL TURNQUEST** possessed approximately 72 grams of crack cocaine for distribution, in Room 444, Knights Inn, 262 Belle Hill Road in Elkton, Maryland.

14. On or about April 14, 2006, defendant **DAVID SPRATT** possessed approximately 11 grams of crack cocaine for distribution, and drug paraphernalia, at 116 Huntsman Drive in Elkton, Maryland.

15. On or about May 12, 2006, defendants **VERNICE GARVIN** and **DAVID CARTER** possessed approximately 85 grams of crack cocaine for distribution, \$668, and a .22 caliber AR-7 Explorer Long Rifle, serial number removed, loaded with 23 live rounds of .22 caliber ammunition and one in the chamber, at 433 McGrady Road in Rising Sun, Maryland.

16. On or about June 6, 2006, Person #3 known to the grand jury (Person #3), rented a room at the Motel 6, 223 Belle Hill Road in Elkton, Maryland, from which Person #3 sold crack cocaine obtained from defendant **KAREEM SMITH**.

17. On or about August 2, 2006, defendant **KAREEM SMITH** used the telephone to discuss the sale of cocaine.

18. On or about August 16, 2006, defendant **KAREEM SMITH** used a telephone to discuss the sale of cocaine.

19. On or about August 22, 2006, defendant **STEVEN BERNARD** sold approximately .4 grams of crack from 239 Charbon Lane in North East, Maryland.

20. On or about August 24, 2006, defendants **KAREEM SMITH** and **JAMAL TURNQUEST** possessed approximately 55 grams of crack cocaine for distribution, drug paraphernalia, and a total of approximately \$2,083, inside 239 Charbon Lane, North East, Maryland.

On or about October 16, 2006:

21. Defendant **KAREEM SMITH** used a telephone to arrange for the sale of crack cocaine.

22. Defendants **KAREEM SMITH** and **JAMAL TURNQUEST** possessed approximately 29 grams of crack cocaine for distribution, which they obtained in Philadelphia, Pennsylvania, inside a white Dodge Caravan, bearing Maryland Temporary license tag number 86365X, on Interstate 95 between Elkton, Maryland and the District of Delaware. When defendants **SMITH** and **TURNQUEST** believed they were being followed by the police, defendant **SMITH** sped away to evade the police but crashed the car in Delaware.

23. Defendants **KAREEM SMITH** and **JAMAL TURNQUEST** also possessed approximately 191 grams of crack cocaine for distribution, which they obtained in Philadelphia, Pennsylvania; a Pyrex glass bowl and spoon, containing crack residue and used for converting cocaine to crack cocaine; razor blades and a glass dish both containing crack residue and used for packaging crack cocaine; and a US-300 digital scale containing crack residue; all inside Apartment G, The Meadows Apartments, 103 Deerfield Road in Elkton, Maryland.

24. On or about November 27, 2006, defendant **FREDERICK LECOUNT** possessed approximately 168 grams of crack cocaine for distribution, a digital scale, and approximately \$1,221 in drug proceeds, in Room 409 of the Knights Inn, 262 Belle Hill Road, Elkton, Maryland.

25. On or about November 30, 2006, defendant **KAREEM SMITH** possessed approximately \$5,789 in drug proceeds; a counterfeit Maryland driver's license in the name of "Jon Anthony Carter Lasand" and bearing the photograph of defendant **SMITH**; and a drug tally sheet, in Philadelphia.

26. On or about March 14, 2007, defendant **KENNETH BALDWIN** possessed approximately 14 grams of crack cocaine for distribution, approximately 2 grams of cocaine, and approximately 21 grams of marijuana, along with two firearms, at 1534 South 52nd Street, in Philadelphia.

All in violation of Title 21, United States Code, Sections 846 and 841(a)(1)(A).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 14, 2007, in the Eastern District of Pennsylvania, defendant

**KENNETH BALDWIN,
a/k/a “Chico,”
a/k/a “Big Money,”**

knowingly possessed a firearm, that is: (1) a Marlin .22 caliber rifle, serial number 15717201; (2) a Rossi pump .22 caliber rifle, serial number G387107; and (3) a .22 caliber ammunition in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute crack cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 846, as charged in Count One of this indictment.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 14, 2007, in the Eastern District of Pennsylvania, defendant

**KENNETH BALDWIN,
a/k/a “Chico,”
a/k/a “Big Money,”**

having been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce, a firearm and ammunition, that is: (1) a Marlin .22 caliber rifle, serial number 15717201; (2) a Rossi pump .22 caliber rifle, serial number G387107; and (3) a .22 caliber ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 21, United States Code, Section 846, set forth in this indictment, defendants

**KAREEM SMITH,
a/k/a “Wink,”
a/k/a “Lucky,”
a/k/a “Lamar Jones,”
a/k/a “Ronald Parker,”
JAMAL TURNQUEST,
a/k/a “Pop,”
DARRYL DUNBAR,
a/k/a “DJ,”
a/k/a “Mark Cross,”
DAANIYAL MUHAMMAD,
a/k/a “Lil,”
a/k/a “Kalil,”
VERNICE GARVIN,
a/k/a “VG,”
MALIK BLAND,
a/k/a “Easy,”
FREDERICK LECOUNT,
a/k/a “JR,”
a/k/a “Junior,”
a/k/a “Big Man,”
STEVEN BERNARD,
a/k/a “Philly Steve,”
a/k/a “Steve Owens,”
DAVID CARTER,
MICHAEL MARTIN
JASON YURTH
KENNETH BALDWIN,
a/k/a “Chico,”
a/k/a “Big Money,” and
DAVID SPRATT**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense; and

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense, including, but not limited to, the sum of \$1,900,000.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**